

Sweet

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

GREEK ORTHODOX ARCHDIOCESE
FOUNDATION, by and through GEORGE KERITSIS,
TRUSTEE, individually and on behalf of all others
similarly situated,

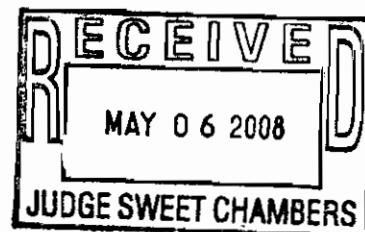
Plaintiff,

v.

THE BEAR STEARNS COMPANIES INC., JAMES E.
CAYNE, ALAN D. SCHWARTZ, and SAMUEL L.
MOLINARO, JR.,

Defendants.

08 CV 03013 (RWS)



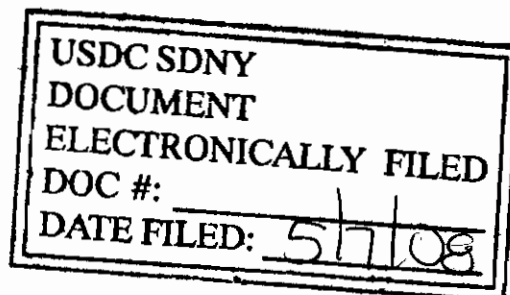
STIPULATION AND [PROPOSED] ORDER

WHEREAS, the Complaint in the above-captioned action (the "Action")
was served on Defendant The Bear Stearns Companies Inc. ("Bear Stearns") on April 3,
2008, and Bear Stearns' Answer would have been due on April 23, 2008;

WHEREAS, there have been no previous requests for an extension of time
to answer, move against, or otherwise respond to the Complaint served in the Action;

IT IS HEREBY STIPULATED AND AGREED, by and between the
undersigned counsel for the parties to these actions, as follows:

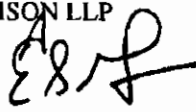
1. Defendants shall not be required to answer or otherwise respond to, and
are hereby expressly relieved from answering or otherwise responding to, the Complaint
served in the Action until after the decision on plaintiff's Motion for Appointment as
Lead Plaintiff and Lead Counsel, at which time the parties will confer on a schedule for
responding to the Complaint.



IT IS FURTHER STIPULATED AND AGREED that nothing herein shall
be deemed to constitute a waiver of any defenses in the Action. Defendants reserve all
arguments and defenses in the Action.

Dated: April ~~30~~ 2008
New York, New York

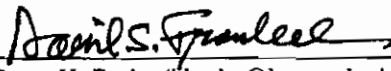
PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

By: 
Brad S. Karp (bkarp@paulweiss.com)
Eric S. Goldstein (egoldstein@paulweiss.com)

1285 Avenue of the Americas
New York, New York 10019-6064
Tel. (212) 373-3000
Fax (212) 757-3980

Attorneys for Defendant The Bear Stearns Companies, Inc.

KRAMER LEVIN NAFTALIS & FRANKEL LLP

By: 
Barry H. Berke (bberke@kramerlevin.com)
David S. Frankel (dfrankel@kramerlevin.com)

1177 Avenue of the Americas
New York, New York 10036
Tel. (212) 715-9100
Fax (212) 715-8000

Attorneys for Defendant James E. Cayne

SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP

By: 

Jay Kasner (jay.kasner@skadden.com)

Susan Saltzstein (susan.saltzstein@skadden.com)

4 Times Square
New York, New York 10036-6522
Tel. (212) 735-3000
Fax (212) 735-2000

Attorneys for Defendant Alan D. Schwartz

SIMPSON THACHER & BARTLETT LLP

By: _____

Michael Chopiga (mchopiga@stblaw.com)

425 Lexington Avenue
New York, New York 10017
Tel. (212) 455-2000
Fax (212) 455-2502

Attorneys for Defendant Samuel L. Molinaro, Jr.

FEDERMAN & SHERWOOD

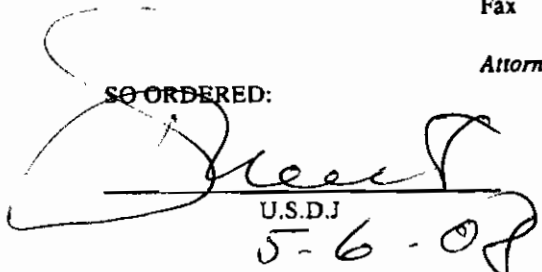
By: _____

William B. Federman

10205 North Pennsylvania Ave.
Oklahoma City, Oklahoma 73120
Tel. (405)235-1560
Fax (405)239-2112

Attorneys for Plaintiff

SO ORDERED:


U.S.D.J.
5-6-08

SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP

By: _____
Jay Kasner (jay.kasner@skadden.com)
Susan Saltzstein (susan.saltzstein@skadden.com)

4 Times Square
New York, New York 10036-6522
Tel. (212) 735-3000
Fax (212) 735-2000

Attorneys for Defendant Alan D. Schwartz

SIMPSON THACHER & BARTLETT LLP

By: Michael T. Chepiga
Michael Chepiga (mchepiga@stblaw.com)
William T. Russell, Jr. Curves 461m.com
425 Lexington Avenue
New York, New York 10017
Tel. (212) 455-2000
Fax (212) 455-2502

Attorneys for Defendant Samuel L. Molinaro, Jr.

FEDERMAN & SHERWOOD

By: _____
William B. Federman

10205 North Pennsylvania Ave.
Oklahoma City, Oklahoma 73120
Tel. (405)235-1560
Fax (405)239-2112

Attorneys for Plaintiff

SO ORDERED:

U.S.D.J.

SKADDEN, ARPS, SLATE, MEAGHER &
FLOM LLP

By: _____
Jay Kasner (jay.kasner@skadden.com)
Susan Saltzstein (susan.saltzstein@skadden.com)

4 Times Square
New York, New York 10036-6522
Tel. (212) 735-3000
Fax (212) 735-2000

Attorneys for Defendant Alan D. Schwartz

SIMPSON THACHER & BARTLETT LLP

By: _____
Michael Chopiga (mchopiga@stblaw.com)

425 Lexington Avenue
New York, New York 10017
Tel. (212) 455-2000
Fax (212) 455-2502

Attorneys for Defendant Samuel L. Molinaro, Jr.

FEDERMAN & SHERWOOD

By: 
William B. Federman (WF9124)

10205 North Pennsylvania Ave.
Oklahoma City, Oklahoma 73120
Tel. (405)235-1560
Fax (405)239-2112

Attorneys for Plaintiff

SO ORDERED:

U.S.D.J.